

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION

BEATRICE BOLER, *et al.*,

Plaintiffs,

v

DARNELL EARLEY, *et al.*,

Defendants.

No. 5:16-CV-10323-JCO-MKM

HON. JOHN CORBETT  
O'MEARA

MAG. MONA K. MAJZOUN

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**NOTICE OF SCREENING DEVICE**

To: The Court, All Parties, and their Attorneys:

**PLEASE TAKE NOTICE THAT**, pursuant to the Michigan Rule of Professional Conduct:

1. A potential or actual conflict of interest, or the appearance of a conflict of interest, exists in the above matter between the State Operations Division and Attorney General Bill Schuette, Legal Secretary Supervisor Kelly Schumaker, Judge David Hoort, Dana Wood – Attorney, and Jeffrey Seipenko – Investigator.

2. A screening notice has been sent to all Michigan Attorney General staff advising that a conflict wall has been established and identifying all persons screened from this matter. The screening notice specifies the conduct appropriate to observe the conflict wall.

3. The relevant divisions within the Department are instructed to physically label all paper files relating to the screened matter and to place the file in a physically segregated area marked with special coding. The label identifies all other divisions or persons who are screened from the file to clearly establish who may not view the contents of the file. Any computer or electronic files are likewise marked and access denied to any screened employees.

4. The procedures outlined above have been completed in this matter.

Respectfully submitted,

/s/ Richard S. Kuhl

Richard S. Kuhl (P42042)

Margaret A. Bettenhausen (P75046)

Megen E. Miller (P78901)

*(pending admission)*

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Dated: February 23, 2016

## CERTIFICATE OF SERVICE

I hereby certify that on February 23, 2016, I electronically filed the above document(s) with the Clerk of the Court using the ECF System, which will provide electronic copies to counsel of record.

Respectfully submitted,

/s/ Richard S. Kuhl  
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Dated: February 23, 2016